

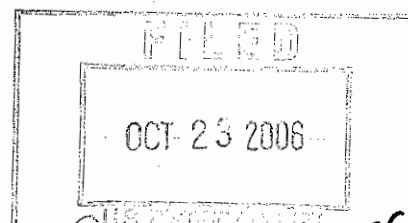
United State District Court for the
District of Delaware

Kenneth Nolland,
- Plaintiff -

- vs -

CW. no., 05-464-(SLR)

Stan Taylor, Et al.,
- Defendants -



Motion to Amended Complaint

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Plaintiff Kenneth Nolland, pursuant to Rule 15 (A) and 19 (A), Fed. R. Civ. P., Requests to file an amended complaint by correcting and adding the names of the parties responsible.

1.) Since the filing of his complaint, the Plaintiff has learned through discovery, the names of the individuals responsible in paragraphs (3) of Parties, and 69, 70, 71, of Claims of Relief, also in section (A) paragraph (5), of compensatory damages, and section (B) paragraph (2), of Punitive damages of the relief requested, should be amended to reflect the identity of Officers Raymond, Justice, and Demarco.

The court should grant the Plaintiff freely to amended his complaint and dismiss any actions regarding this complaint against Bill Eto, Helen Moore and Stephen Devine.

Date, 10-20-06

Respectfully yours
Kenneth Holland

Claims of Relief

69. Defendants Sgt. Wilbur Justice, Counselor Kent Raymond, and Counselor Theresa DeMarco, failure to allow the Plaintiff to be present to represent himself at disciplinary hearing, constitutes deliberate indifference, Due Process and Equal protection violations of the constitution.
70. Defendants Sgt. Wilbur Justice, counselor Kent Raymond and Counselor Theresa DeMarco, collectively decided to sentence the Plaintiff to a sanction outside of the guidelines. constitutes false imprisonment, deliberate indifference, cruel and unusual punishment, Due Process and Equal Protection Violation of the constitution.
71. Defendants Sgt. Wilbur Justice, counselor Kent Raymond, and Counselor Theresa DeMarco, failure to provide Plaintiff with a fair timely appeal process, constitutes Malicious denial of Due Process, deliberate indifference, Equal Protection violation of the constitution.

Award compensatory damage in the following
Amount

A.)

2. \$200,000, jointly and severally against defendants Wilbur Justice, Kent Raymond and Theresa DeMarco, for the excessive punishment and emotional injuries sustained as a result of their denial of Plaintiff's Due Process rights in connection with disciplinary hearing, sanction and

appeal as well as false imprisonment.

B.)

2. Award Punitive damage in the following amounts.

^{\$}100,000, each against Wilbur Justice, Kent Raymond
and Theresa DeMaree.

I declare under penalty of perjury that the foregoing
is true and correct.

Date 10-20-06

Kenneth Holland

IM James Holland
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DELAWARE CORRECTIONAL CENTER
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